



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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March 30, 2015

Mr. Ramon Mendoza
Federal On-Scene Coordinator
U.S. Environmental Protection Agency, Region V
Superfund Division, Removal Branch 2 SE-5J
77 West Jackson
Chicago, IL 60604

Re: Operable Unit 1 – Pilsen Soils Railroad Spur and Alley Site
LPC# pending – Cook County
SF/Tech

Dear Mr. Mendoza:

Per your request, Illinois EPA is identifying Applicable, Relevant, and Appropriate Requirements (ARARs) for the Operable Unit 1 – Pilsen Soils Railroad Spur and Alley Site located in Chicago, Illinois. Throughout this time-critical removal activity, please forward to me the Action Memorandum, Removal Action Report(s), periodic Pollution Reports (POLREPS), and other relevant site information in order to keep the Illinois EPA Bureau of Land files current and accurate.

To assist U.S. EPA, the Illinois EPA has identified the following State ARARs for the immediate removal of containers. Containers include drums, tanks, and roll-off-boxes. For the ARARs listed in the attachment to this letter, USEPA is considered to be the generator of the waste.

In Illinois, our Resource Conservation and Recovery Act (RCRA) regulations are essentially identical to the Federal RCRA regulations. The essential difference between the Federal and State ARARs for solid wastes is the classification of Special Waste in Illinois.

As part of the removal coordination effort between Illinois EPA and U.S. EPA, please contact me at the above number if you have any additional site-specific questions or additional requests.

Sincerely,

Bruce Everetts
Office of Site Evaluation
Division of Remediation Management
Bureau of Land

bcc: Division File, w/ attachments

**STATE of ILLINOIS ARARs
for
IMMEDIATE REMOVALS of CONTAINERS**

Regulatory Citation	Requirement
	Determine the Regulatory Classification of the material
35 IAC 722.111 (40 CFR 262.11)	The generator of a solid waste must determine whether it is a hazardous waste.
35 IAC 808.110	The waste will probably be classified as a Special Waste. Special wastes are hazardous wastes, industrial process wastes, and pollution control wastes. Pollution control wastes include contaminated media.
	Obtain IEPA & USEPA Identification Numbers
35 IAC 722.112 (40 CFR 262.12)	A generator must obtain a USEPA identification number prior to transporting hazardous waste off-site.
35 IAC 809.501	A generator must obtain an IEPA identification number in order to properly complete an Illinois manifest.
	Transportation of Wastes Off-Site
35 IAC 723.120 (40 CFR 263.20)	Hazardous waste must be manifested to a facility that is permitted to accept it.
35 IAC 809.501	Special waste must be manifested to a facility that is permitted to accept it.
35 IAC 809.201	All vehicles that haul special waste on public highways in Illinois must have a Special Waste Hauling Permit.
	On-Site Management of Wastes
35 IAC 722.134 (40 CFR 262.34)	Containers of hazardous waste can be stored on-site for less than 90 days without obtaining a permit or interim status provided that they are managed in accordance with the requirements at 35 IAC Part 725, Subpart I: <ul style="list-style-type: none"> - the containers must be in good condition (non-leaking), - the containers must be compatible with the wastes placed in them,

**STATE of ILLINOIS ARARs
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Regulatory Citation	Requirement
	<ul style="list-style-type: none"> - the containers must always be closed except when it is necessary to add or remove waste, - the containers must not be opened, or managed in a way that may cause them to rupture or leak, - the containers must be inspected weekly, - incompatible wastes must not be placed in the same container, - a container of waste that is incompatible with other wastes must be separated from the other wastes, - containers of ignitable or reactive waste must be located at least 50 feet from the property line,
35 IAC 722.134 (40 CFR 262.34)	The 90 day exclusion only applies to wastes that are managed in containers, tanks, drip pads or containment buildings. Hazardous waste that is placed on the ground is subject to all of the regulations for a waste pile as soon as it is placed on the ground.